

November 17, 2023

Hon. Charles R. Breyer
United States District Judge
Phillip Burton Federal Building
450 Golden Gate Avenue
San Francisco, CA 94102

Via ECF

Re: *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*
Case No. 3:23-md-03084-CR

Dear Judge Breyer:

Pursuant to Pretrial Order No. 3, Meredith Drukker Stratigopoulos of WATTS GUERRA submits this Application for Appointment to the Plaintiffs' Steering Committee.

1. WATTS GUERRA Possesses Extensive Experience in Mass Tort Litigation

WATTS GUERRA possesses extensive experience in mass tort litigation, including plaintiffs' leadership appointments in federal and state MDLs where we have represented more than 200,000 individual clients. I am honored to apply to the Plaintiffs' Steering Committee of this MDL with the full support and resources of my firm. My personal experience will likely look different than others applying to this leadership slate. I am a sixth-year attorney, the youngest current partner at my law firm, and this would be my first leadership appointment. I have been practicing at WATTS GUERRA since 2018. I was an associate before being promoted to partner in 2022 where, at thirty-years-old, I have chaired multiple trials, litigated thousands of motions, and handled hundreds of hearings and depositions. My firm believes in involving my generation of partners in every aspect of litigation and actively mentoring us into leaders. I have benefited from this immensely and hope to continue to do so as a leader in this litigation.

In MDLs, I have experience working on ESI administration, briefing, case-vetting and deposition-work. Notably, this includes taking Endo Pharmaceutical's corporate representative's deposition in *In re National Prescription Opiate Litig.* I served as one of six administrators for the ESI platform used in *Opioids* for the state liaison counsel. I have worked on client intake and vetting on 3M and *In re: PG&E Corp.* and have worked on document review teams for other MDLs including *Valsartan*, *Juul*, and *Zantac*.

I will be working directly with Mikal Watts, our firm's Capital Partner, and Alicia O'Neill, our Mass Tort Director (who served over a decade as a Harris County Prosecutor handling hundreds of sexual violence cases). While these are not my personal appointments, my mentors at our firm have been named to leadership in multiple MDLs and bring that experience to this case. **See Exhibit "A."**

WATTS GUERRA has been involved in the early vetting of mass tort cases through Court-ordered information sheets or censuses in 3M, *Roundup*, *JUUL*, *California FVT Fires*, *Zantac*, *Camp Lejeune*, *Paraquat*, and *APAP* and has gained unique knowledge and skills from its work in helping create, complete, and submit these forms. This litigation is one that would benefit significantly from WATTS GUERRA's experience and manpower in the practice of the early and thorough vetting of cases. Our office has a strong history of bringing in thousands of clients in MDL cases through our in-house Mass Tort Offices.

WATTS GUERRA also serves as the focal point for a network of more than 1,000 referral counsel. As a result, when WATTS GUERRA enters national litigation, it can emerge representing a majority of all claimants. We have the ability to bring in as many qualified clients as require representation, the organization to make sure that they are quality and qualifying clients, and the workforce to properly communicate with them and mature their claims.

Perhaps the best example of what WATTS GUERRA can do is in the *California North Bay Fire Cases* JCCP No. 4955, and the *Camp Fire* cases resolved in PG&E's Bankruptcy, Case No. 19-30088 (DM) in the United States Bankruptcy Court for the Northern District of California – San Francisco Division. WATTS GUERRA represented 17,730 fire survivors victimized by the California wildfires that occurred in 2017 and 2018, which victims made claims through the resulting Fire Victim Trust ("FVT"); by submitting more than 17,000 complete claims forms WATTS GUERRA estimates that its clients will be entitled to approximately 25% of the approximate \$13.5 billion proceeds. Through our conservative and aggressive early vetting process, we will be able to streamline viable cases through this MDL with efficiency as it is likely that thousands of claimants will continue to come forward throughout this process. It is imperative that leadership establish and hold the line on appropriately tailored criteria. WATTS GUERRA's experience in this department and in-house staff to support this endeavor will be invaluable.

2. I will Readily Fulfill my Obligations to this Court and Prioritize this Litigation

Serving as leadership in this MDL is both compatible and consistent with my current obligations. I am willing to, and have my firms' support to, put all of my time and effort toward this appointment and in service of these worthy survivors. To facilitate my hopeful appointment as a member of the Uber MDL leadership, I have refrained from applying for other leadership positions in any other MDL and preemptively controlled the volume my personal docket so that I personally have the bandwidth to dedicate the majority of my time and efforts to this litigation as it progresses. As well, as outlined below, WATTS GUERRA employs a substantial number of human resources, including lawyers and mass tort staff, who may be available to join Plaintiffs' prosecution efforts as responsibility increases.

3. I am Committed to Working Collaboratively with all Plaintiffs' and Defense Counsel

I welcome the opportunity to work with whomever the Court appoints as Plaintiffs' leadership and I believe that collaborative and organized work by leadership in this litigation will serve to meet this Court's goal of a just, speedy, and inexpensive resolution of this litigation. My firm has enjoyed productive working relationships with many of those also being considered for appointment. I am in full agreement with the proposed slate attached hereto as **Exhibit "B."**

Furthermore, I am committed to a professional relationship with Defense Counsel. I treat opposing counsel with respect by default and pride myself in taking the high road at any juncture possible while still zealously advocating for my clients. This includes working with Defense Counsel's schedules for calls and meetings, being respectful of reasonable requests for extensions if truly needed, taking the first step to pick up the phone to clear up misunderstanding if it arises, and ensuring that Plaintiffs have

conferred in sincere good faith whenever required.

4. WATTS GUERRA has Substantive Resources Available to Dedicate to this Litigation

Our firm has the ability to devote substantial financial and human resources to this litigation. We have recovered over \$6 billion for hundreds of thousands of clients and stand prepared to invest whatever is required to prosecute the claims made the basis of this MDL and drive the process to closure on the earliest possible date. Our firm employs over 46 lawyers and over 200 staff members, most of whom are assigned to mass torts full time and at our disposal to help with this litigation. These numbers include over 20 young and eager associates, two of whom have already been assigned to this MDL. Furthermore, three of our lawyers are board-certified appellate attorneys who will be available to assist with briefing and evaluation throughout this litigation, avoiding the need to consult outside appellate counsel in the event of appealed orders.

5. I Have Extensive Experience Litigating Sexual Assault Cases

I am dedicated to the resolution of sexual assault claims and my practice centers on representing survivors. I am assigned as the litigating partner for each of WATTS GUERRA's sexual assault cases. Among those I represent are children who were sexually assaulted in sports and school scenarios and adult survivors who found themselves in vulnerable positions with abusers. In each of these cases, I have taken extreme care prevent re-traumatization throughout litigation. I personally have created trusting relationships with my clients and walked them through their depositions, passing them tissues throughout the process. This experience is invaluable when advocating for the Plaintiffs in assault cases and to creating a damage model when the time comes. There is no substitute for boots-on-the-ground litigation experience with sex assault survivors when it comes to evaluating damages.

Here, WATTS GUERRA expects to represent a sizable number of total plaintiffs that have been sexually assaulted by Uber drivers. In the discharge of our duty to our clients, we are committed to investing whatever resources are required to prosecute the claims made the basis of this MDL fully and properly and expedite a productive outcome for all plaintiffs.

It would be an honor to serve this Court. I welcome the opportunity to answer any questions that the Court may have after a review of this application and am grateful for the opportunity to apply to serve in this important litigation.

Respectfully submitted,

Sincerely,



Meredith Druker Stratigopoulos

EXHIBIT A

MDL LEADERSHIP EXPERIENCE

1. *In re: Norfolk Southern Train Derailment in East Palestine, Ohio* (Case No. 423CV0604) (court-appointed member of the Plaintiffs' Executive Committee);
2. *In re: Hair Relaxer Marketing Sales Practices and Products Liability Litigation* (MDL 3060) (court-appointed member of the Plaintiffs' Steering Committee) ("PSC");
3. *In re: Acetaminophen – ASD/ADHD Products Liability Litigation* (MDL 3043) (court-appointed co-lead counsel);
4. *In re: Texas Opioid Litigation* (Texas MDL No. 18-0358) (head of Plaintiffs' Settlement Committee; court-appointed member of the PSC);
5. *In re: Juul Labs, Inc.* (MDL 2913) (court-appointed member of the PSC);
6. *In re: Zantac Products Liability Litigation* (MDL 2924) (court-appointed member of the PSC; court-appointed head of trial team);
7. *In re: Paraquat Cases* (JCCP 5031) (court-appointed PSC);
8. *In re: Kincaid Fire* (JCCP 5157) (court-appointed Plaintiffs' Liaison Counsel);
9. *In re: Zogg Fire* (JCCP 5165) (court-appointed Plaintiffs' Liaison Counsel);
10. *In re: Dixie Fire* (JCCP 5208) (court-appointed Plaintiffs' Liaison Counsel);
11. *In re: Bobcat Fire* (20STCV42356- court-appointed Co-Lead Counsel);
12. *In re: Valsartan N-Nitrosodimethylamine (NDMA) Contamination Products Liability Litigation* (MDL 2875) (court-appointed member of the PSC);
13. *In re: California North Bay Fires Cases* (JCCP 4955) (appointed member of the Plaintiffs' Settlement Committee);
14. *In re: Syngenta AG MIR162 Corn Litigation*, MDL 2591 (D. Kan.) (court-appointed member of Plaintiffs' Settlement Committee);
15. *In re: Pradaxa (Dabigatran Etexilate) Products Liability Litigation* (MDL 2385) (court-appointed co-lead counsel);
16. *In Re: Stand 'N Seal* (MDL 1804) (court-appointed co-lead counsel);
17. *In Re: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico* (MDL 2179) (court-appointed member of the PSC);

18. *In Re: FEMA Trailer Formaldehyde Products Liability Litigation*, MDL 1873 (court-appointed member of the PSC);
19. *In Re: Silica* (MDL 1553) (court-appointed co-liaison counsel).

EXHIBIT B

[Proposed] Plaintiffs' Leadership Group ("PLG")

Co-Leads:

Rachel Abrams

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Sarah London

Lieff Cabraser Heimann & Bernstein

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Roopal Luhana

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Plaintiffs' Executive Committee

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Nigh Goldenberg Raso & Vaughn

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Plaintiffs' Steering Committee

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Plaintiffs' Liaison Counsel

Khaldoun Baghdadi
Walkup, Melodia, Kelly & Schoenberger
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Coordination with JCCP Counsel

The PLG has had ongoing discussions with members of the JCCP Leadership to coordinate proposed MDL leadership but has not reached an agreement. To facilitate coordination with the MDL and the JCCP, the PLG proposes that the following counsel be added to the Proposed Leadership Group.

Brian Abramson as a member of the Plaintiffs' Steering Committee
Williams Hart Boundas

Celine Cutter (JCCP) as Plaintiffs' Liaison Counsel
Cutter Law Group

Meredith Drukker Stratigopoulos
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811 Barton Springs Rd. Ste. 725 Austin, Texas 78704

EXPERIENCE

Watts Guerra LLP, Austin, TX

Partner, 2022-Present

I currently manage a docket consisting of multi-district litigation, sexual assault litigation and personal injury litigation. I have actively taken cases to and through trial with carefully written motions, engaging direct and cross examination, powerful opening statements and detail-oriented deposition designation offers and objections. I have served as lead counsel in dozens of hearings and hundreds of depositions. I value a delicate balance of aggressive trial preparation with meaningful settlement negotiations in each and every case to provide client-focused opportunities for resolution.

Watts Guerra, LLP, Austin, TX

Associate, 2018-2022

As an Associate, I zealously advocated for individual and commercial plaintiffs while developing trial skills. I also participated in document review administration, deposition preparation and expert-facing work in multi-district litigation. I became well-versed in deposition work including corporate representatives, expert witnesses, parties and fact witnesses. Finally, I meticulously researched, briefed, and argued pretrial and trial motions.

Watts Guerra LLP, Austin, TX

Law Clerk, 2016 - Spring 2018

As a law clerk, I drafted motions, discovery and pleadings while maintaining full-time coursework at the University of Texas School of Law. I completed hundreds of hours of document review in various multi-district litigation cases and assisted in two federal criminal trials.

Beck Redden LLP, Austin, TX

Summer Associate, Summer 2017

At Beck Redden, LLP I drafted pretrial motions, conducted document review and researched various appellate issues in preparation for hearings at the Fifth Circuit.

EDUCATION

The University of Texas School of Law, Juris Doctor, May 2018

Positions: Associate Editor for Vol. 37 of *The Review of Litigation*

Clinics: Domestic Violence Clinic, Spring 2018

Texas Christian University, cum laude, Bachelor of Arts, English, Minor in Political Science, May 2015

Honors: Dean's List: Fall 2014, Spring 2015

Sigma Tau Delta: English Honor Society

SPEAKING ENGAGEMENTS AND PUBLISHED WORK

Perrin Sex Abuse Litigation and Coverage Conference, October 5, 2023, CLE Conference Panel

Sexual Assault Damages: The Plaintiff's Perspective

Perrin Conferences, February 15, 2023, CLE Webinar

Social Media and Sex Trafficking: An Analysis of Ongoing Litigation

Perrin Conferences, November 16, 2022, CLE Webinar

Enabling Modern Slavery: The Role of Hotels and Venues in Sex Trafficking

Journal of Cyberlaw and Warfare, August 5, 2020

Democrats and Republicans Seek Federal Jurisdiction Over Cybercrimes by Foreign Actors in DNC v. Russian Federation and Broidy Capital Mgmt. v. State of Qatar

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HONORS AND INVOLVEMENT

The National Trial Lawyers, Top 40 Under 40 - Civil Plaintiff, 2022

Texas Trial Lawyers Association, Austin, TX
Board of Directors, 2023

Texas Trial Lawyers Association, Austin, TX
Advocates Board of Directors, 2019-2022

Organized fundraising efforts, leadership development initiatives, membership engagement and educational experiences for TTLA Members.